

1) All records of any air monitoring conducted during decommissioning and demolition of the site

Wolverine objects to this request as unduly burdensome and unreasonable to the extent that it asks Wolverine to respond to matters beyond its knowledge or to produce documents or information not within its possession, custody, and control. Subject to its general objections, Wolverine produces in response to this Request (3a-f) the documents in folder numbers 3 and 3-4 on the enclosed compact disc.

4. Identify the chemicals historically used at the site.

Wolverine objects to this request as unduly burdensome and unreasonable to the extent that it asks Wolverine to respond to matters beyond its knowledge or to produce documents or information not within its possession, custody, and control. Subject to its general objections, Wolverine produces in response to this Request the documents in folder number 3-4 on the enclosed compact disc.

7. Identify the location of any drum storage area at the site, and identify any wastes that were stored in such areas.

Wolverine objects to this request as unduly burdensome and unreasonable to the extent that it asks Wolverine to respond to matters beyond its knowledge or to produce documents or information not within its possession, custody, and control. Subject to its general objections, Wolverine produces in response to this Request the documents in folder numbers 7 and 3-4 on the enclosed compact disc. By way of further answer, to Wolverine's knowledge the drum storage area at the site was used to store raw materials, not wastes. Waste was discharged through process piping to the wastewater treatment plant. Pressed sludge cakes from the wastewater treatment plant were disposed of at an approved offsite landfill.

8. Identify the protocols that were followed during the tannery's demolition to characterize soils, demolition materials and any wastes discovered on site during the demolition, and identify the locations to which soils, demolitions and waste materials were sent.

Wolverine objects to this request as unduly burdensome and unreasonable to the extent that it asks Wolverine to respond to matters beyond its knowledge or to produce documents or information not within its possession, custody, and control. Subject to its general objections, Wolverine produces in response to this Request the documents in folder number 3 on the enclosed compact disc. By way of further answer, Wolverine disturbed soils as little as possible during demolition. During demolition, in the event that Wolverine noticed a soil condition that appeared out of the ordinary, Wolverine characterized the soil based on available data. This occurred in two locations. One location was the space under tannery maintenance area where the waste line to the wastewater treatment plant had broken. The broken line was identified as the source of any soil contamination. Accordingly, the soil was characterized as the same waste that had historically been treated at the wastewater treatment plant. It was disposed of as such by Valley City Environmental. The other location was directly under the primary clarifier tank at the wastewater treatment plant. In that location, there was a small amount of discolored soil that